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July 7, 2023

Via ECF

Hon. Esther Salas, U.S.D.J.
Martin Luther King Building & U.S. Courthouse
50 Walnut Street
Newark, NJ 07101

Re: Hair Zone, Inc. v. Bae et al.
Case No. 2:23-cv-03598-ES-AME

Dear Judge Salas:

This firm represents Dae Do Inc. ("DDI") in the above-referenced action. On July 5, 2023, Plaintiff filed this action and simultaneously filed an application for a temporary restraining order. DDI opposes the application and intends to submit additional opposition papers in advance of the hearing on the application. That hearing is currently scheduled for July 11, 2023 at 1:00 pm. I am writing to request that the hearing be adjourned until July 13 or 14.

Plaintiff's application relies on a declaration that attached exhibits that were filed under seal. Neither DDI nor its counsel has had access to the evidence being relied on to support the plaintiff's application for relief. I spoke with plaintiff's counsel, who states that he will send me the documents filed under seal under an attorneys' eyes only agreement. See attached. I do not have those documents yet.

In order to prepare for the hearing, DDI's counsel will need to review the evidence that plaintiff is relying on in support of its application. Since we have been deprived of this opportunity thus far, DDI respectfully requests that the Court adjourn the TRO hearing for not less than 48 hours.

I have consulted with plaintiff's counsel, who objects to DDI's request for any adjournment and has informed me that he has a conflict on July 13.

Thank you for Your Honor's consideration of this matter.

Respectfully submitted,



Vincent N. Avallone

cc: All counsel of record (via ECF)

From: [Avallone, Vincent N.](#)
To: dlevy@ebglaw.com
Cc: [Rinschler, Joshua D.](#); [Nichols, TJ](#); DMordkoff@ebglaw.com
Subject: Hair Zone v. Dae Do Inc., et al./Sun Taiyang v. Dae Do Inc., et al.
Date: Friday, July 07, 2023 11:03:24 AM

Hi Dan,

It was nice to speak with you this morning. As discussed, this firm is representing Dae Do Inc. ("Vivace") in these two lawsuits. I do not know yet if this firm will be representing the individual defendants. As we also discussed, I am looking to obtain the documents you filed under seal. Pending further agreement or order of the Court, I agree that the documents will be attorneys' eyes only with respect to Vivace and that I will only show them to the individual defendants but not provide them with copies. I would appreciate it if you would send those documents to me and my colleagues copied on this email as soon as possible. Please include Josh and TJ on correspondence in these cases.

Thank you.



Vincent N. Avallone

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